

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI,  
SOUTHERN DIVISION**

ANDREW BRESHEARS, )  
Plaintiff, ) Case No. 6:24-cv-03314-MDH  
vs. )  
AGAPE BAPTIST CHURCH, INC., )  
d/b/a AGAPE BOARDING SCHOOL, ET AL, )  
Defendants. )

**MOTION TO WITHDRAWAL AS COUNSEL FOR PLAINTIFF**

COME NOW, attorneys Ryan D. Frazier, Phillip R. Martens, David M. Mayer, Charles T. Lee, and the law firm of Monsees & Mayer, P.C., counsel for Plaintiff, and move the Court for leave to withdraw as counsel for Plaintiff for reasons that are in compliance with Missouri Rule 4-1.16, 46 CFR § 502.23, the ABA Model Rule 1.16, and Local Rule 83.2. Plaintiff will be provided with a copy of this Motion and will be given Notice of any scheduled hearing on this Motion.

WHEREFORE, Monsees & Mayer, Ryan Frazier, Phillip Martens, David Mayer, and Charles Lee pray that the Court sustain their Motion to withdraw as counsel for the Plaintiff, that the Court enter its Order granting the movants' leave to withdraw as counsel in this matter, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

**MONSEES & MAYER, P.C.**

/s/ Ryan D. Frazier \_\_\_\_\_

Ryan D. Frazier #69081

Phillip R. Martens #69213

David M. Mayer #40861

Charles T. Lee #69191

1021 E. Walnut Street

Springfield, MO 65806

[rrazier@monseesmayer.com](mailto:rrazier@monseesmayer.com)

[rmartens@monseesmayer.com](mailto:rmartens@monseesmayer.com)

[dmayer@monseesmayer.com](mailto:dmayer@monseesmayer.com)

(417) 866-8688

(417) 866-8687

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 18<sup>th</sup> day of February, 2025, this certificate was filed electronically with the U.S. District Court and sent electronically by the court's CM/ECF system to all parties entitled to service:

**John Schultz**  
**FRANKE SCHULTZ & MULLEN, P.C.**  
**8900 Ward Parkway**  
**Kansas City, MO 64112**  
**jschultz@fsmlawfirm.com**

*Attorney for Defendant Agape Baptist Church, Inc.  
d/b/a Agape Boarding School*

/s/ Ryan D. Frazier  
RYAN D. FRAZIER